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March 18, 2021

**Via ECF**

Honorable Analisa Torres  
Daniel Patrick Moynihan  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: *S.C. et al v. N.Y.C. Dep't of Educ., et al*, 21-cv-1579 (AT)(SLC)

Dear Judge Torres:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel, James E. Johnson, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek attorneys' fees, costs, and expenses in relation to legal work on an administrative hearing under the Individuals with Disabilities in Education Act, 20 U.S.C. § 1400 *et seq* ("IDEA"), and for this action.

I write to respectfully request a 60-day extension of Defendant's time to respond to the Complaint from March 23, 2021 to May 24, 2021. In addition, I am requesting that the initial pretrial conference also be adjourned 60 days, from April 26, 2021 to June 26, 2021. This is Defendant's first request to extend these deadlines, and Plaintiffs' counsel, Adam Dayan, Esq., has consented to the requested extension. I was recently assigned to this matter and received the updated billing records from Plaintiffs' counsel yesterday. I request this extension in order to have sufficient time to review the relevant billing records and the underlying administrative hearing record so that the parties may work towards resolution. It is our intention to work expeditiously to resolve this matter without further burden to the court. I note that over the last several years we have been able to resolve similar cases with Mr. Dayan without resort to court intervention.

Thank you for your consideration of these requests.

Respectfully submitted,


/s/  
William G. Rives  
Assistant Corporation Counsel

cc. **Via ECF**  
Adam Dayan  
Law Offices of Adam Dayan, PLLC  
222 Broadway, 19<sup>th</sup> Floor  
New York, New York 10038  
*Attorney for Plaintiffs*

GRANTED in part, DENIED in part. By **April 23, 2021**, Defendant shall answer or otherwise respond to the complaint. The initial pretrial conference will be held as scheduled on April 26, 2021.

SO ORDERED.

Dated: March 22, 2021  
New York, New York

  
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ANALISA TORRES  
United States District Judge